

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LA PLAYITA CICERO, INC., d/b/a  
SERENATA RESTAURANT & BAR, and  
GERARDO MEZA,

Plaintiffs,

v.

TOWN OF CICERO, a municipal  
corporation,

Defendant.

Case No. 11 CV 05561

Honorable Judge John Z. Lee

**JOINT MOTION TO EXTEND PRE-TRIAL DEADLINES**

The Parties, through their undersigned counsel, respectfully move this Court for an extension of time relating to pre-trial deadlines and, in support state:

1. On October 27, 2016, this Court entered an order setting various pre-trial deadlines (Docket 168).

2. Plaintiffs' counsel has had to attend various emergency and discovery related hearings in two other cases since the first of February 2017 that have and will continue through the week of March 13, 2017. As a result, Plaintiffs' counsel has been unable to prepare the Final Pre-Trial Order ("FPTO") and motions in limine in this case, as well as meet with Defendants' counsel more recently in their ongoing attempts to meet and confer in preparation for trial.

3. Because of the complicated procedural history of this case, the parties' counsel agreed to meet and confer to discuss not only the FPTO but if agreement could

be reached on limited discovery that may be needed by either side before trial. On February 16, 2017, Defense counsel sent Plaintiffs' counsel correspondence identifying a preliminary list of witnesses and exhibits she believed would likely be used by Defendants, as well as identifying any possible remaining discovery/disclosure disputes that could be remedied.

4. Because of Plaintiffs' counsel's various emergency and discovery related hearings, Plaintiffs' counsel has been unable to complete Plaintiffs' preliminary list of witnesses and exhibits. The Parties' counsel have had initial discussions in an attempt to meet and confer on the FPTO and motions in limine in preparation for the trial, and will continue to do so. Specifically, Plaintiffs' counsel has responded to some of the discovery disputes/issues that defense counsel identified in her correspondence and identified some concerns regarding Defendant Town of Cicero's production. Plaintiffs' counsel has also agreed to identify any remaining discovery/disclosure disputes to defense counsel so that there is an opportunity to resolve them prior to trial to the extent they can be resolved.

5. The Parties have discussed and agreed to file a joint motion to request extensions to the deadlines as follows:

- a. Plaintiffs will submit a draft pre-trial order and preliminary list of motions in limine to Defendant by March 20, 2017;
- b. Defendant will submit its sections to the draft pre-trial order and preliminary list of motions in limine to Plaintiff by April 3, 2017;

- c. A final meet and confer set for April 7, 2017 at 11:00 a.m.;
- d. Motions in limine to be filed by April 10, 2017;
- e. Final Pre-Trial Order to be filed by April 17, 2017; and
- f. Responses to motions in limine to be filed by April 20, 2017;
- g. Replies in support of motions in limine, to be determined by the Court.

6. The pretrial conference is set before Your Honor on April 27, 2017 at 1:30 p.m.

7. The trial is set to commence in this matter on June 12, 2017.

WHEREFORE, for the above stated reasons, the Parties respectfully request the Court enter an order, for good cause shown, extending the pre-trial deadlines as set forth in Paragraph 5, and for such other relief that is just and equitable.

Respectfully Submitted,

*Plaintiffs' Counsel*

/s/Dana L. Kurtz

*Electronically filed on March 8, 2017*

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